

KML LAW GROUP, P.C.  
A Professional Corporation incorporated in Pennsylvania  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
(215) 627-1322  
Attorneys for LAKEVIEW LOAN SERVICING, LLC

IN THE MATTER OF:

Timothy M. Myers a/k/a Tim Myers a/k/a Area 51  
Lawn and Landscaping LLC

DEBTOR(S),

Nicole Myers

CO-DEBTOR

TO:

Timothy M. Myers a/k/a Tim Myers a/k/a Area 51 Lawn and Landscaping LLC  
516 Elm Avenue  
Audubon, NJ 08106

Nicole Myers  
516 Elm Avenue  
Audubon, NJ 08106

Andrew Thomas Archer  
Brenner Spiller & Archer  
125 Route 73 North  
West Berlin, NJ 08091

Isabel C. Balboa Esq.  
Chapter 13 Standing Trustee  
Cherry Tree Corporate Center  
535 Route 38 - Suite 580  
Cherry Hill, NJ 08002

US TRUSTEE  
Office of the US Trustee  
One Newark Center, Suite 2100  
Newark, NJ 07102

**IN THE UNITED STATES  
BANKRUPTCY COURT FOR THE  
DISTRICT OF NEW JERSEY**

CHAPTER 13  
CASE NO. 22-12461 ABA

**NOTICE OF MOTION FOR RELIEF  
FROM STAY & CO-DEBTOR STAY**

PLEASE TAKE NOTICE THAT the undersigned attorney for **LAKEVIEW LOAN SERVICING, LLC**, will apply to the **UNITED STATES BANKRUPTCY COURT**, located at **400 Cooper Street, 4<sup>th</sup> Floor, Camden, N.J. 08108**, for an Order to Grant Relief from the Automatic Stay to authorize the moving parties to prosecute a foreclosure action for the reason that the debtor and Nicole Myers, co-debtor have failed to maintain their monthly mortgage payments to the Secured Creditor as more particularly set forth in the certification

submitted herewith. Costs and counsel fees will also be requested. The property involved is known as **516 Elm Ave, Audubon NJ 08106**. The hearing on this matter is scheduled for **August 9, 2022 at 10:00 A.M.**

Dated: July 14, 2022

/s/ Denise Carlon, Esq.

Denise Carlon, Esquire  
KML Law Group, P.C.  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
(215) 627-1322  
[dcarlon@kmllawgroup.com](mailto:dcarlon@kmllawgroup.com)  
Attorney for LAKEVIEW LOAN SERVICING, LLC